

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MATTHEW GAMEWELL,

Plaintiff,

V.

Cause No. 4:21-cv-00523-PLC

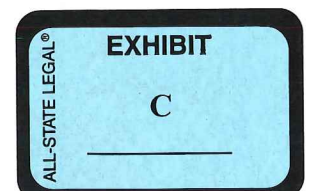
LAFAYETTE WORK CENTER, INC.,

Defendant.

DEFENDANT'S NOTICE OF F.R.C.P. RULE 35 – MENTAL EXAMINATION

COMES NOW Defendant, by and through its attorneys, and hereby notifies Plaintiff that Plaintiff is to submit himself to a mental examination pursuant to Rule 35 of the Federal Rules of Civil Procedures, as follows:

EXAMINERS:	Dr. Elizabeth Pribor
DATE, TIME AND PLACE OF WRITTEN TESTING:	November 3, 2021, at 1:00 p.m. (written testing) 967 Gardenvue Office Parkway Suite 16 Creve Coeur, MO 63141 (314) 528-8383 (Administered by Dr. Rod Hoevet at Dr. Priobor's Request)
DATE AND TIME AND PLACE OF INTERVIEW:	November 10, 2021, at 9:00 a.m. (psych. evaluation/interview) 222 S Meramec Ave Ste 201 Clayton, MO 63105 (314) 863-6444 (Administered by Dr. Priobor)
SCOPE OF EXAMINATION:	Dr. Pribor will administer a complete psychiatric evaluation which frequently entails the use of psychological testing. In this case, Dr. Hoevet will administer the Minnesota Multiphasic Personality Inventory (MMPI-2-RF) (a well validated, standardized and widely utilized test of 338 items) and the Millon Clinical Multiaxial Inventory (MCMI-III) (a well validated standardized, widely utilized test of 175 items). Other focused, psychological or neuropsychological testing may also be indicated depending upon the legal or psychiatric issues to be addressed. The MMPI-2 and MCMI-III are paper and pencil tests which require reading questions and answering true and false. The MMP-2-RF takes approximately 1 to 1½ hours to complete, depending upon the speed



	<p>with which the taker reads and answers questions. The MCMI-III test takes approximately 30 to 45 minutes to complete. The MMPI-2-RF and the MCMI-III are diagnostic aids. They help describe an individual's basic personality and interactive styles, which have been present throughout the majority of the individual's life. To the extent that Plaintiff requires accommodation to complete the written examination, please contact Christine Coleman to further discuss what accommodations will allow Plaintiff to complete the examination.</p> <p>Dr. Pribor will further interview Plaintiff for a period of 4-6 hours, with breaks every 60 to 70 minutes and a lunch break, meaning that the total interview will likely last 6-8 hours. During that interview, Dr. Pribor will obtain a history of Plaintiff's life and his interactive style prior to the subject occurrence. This is required in order to develop a causal relationship between symptoms experienced by Plaintiff, if any, and the events giving rise to them. Specifically, the psychiatric (psychological) evaluation will include a detailed personal history covering such areas as the Plaintiff's childhood, education, marriage and interpersonal life history. It will also include a detailed medical history and information concerning Plaintiff's coping history and ability to cope with stressful situations. Dr. Pribor's testing and evaluation is intended to ascertain the nature, cause and extent of Plaintiff's mental damages, if any, and whether the same are attributable to alleged acts of Defendant as Plaintiff has alleged in Plaintiff's Complaint. The examination will include, but is not limited to, basic physical and mental examination of Plaintiff, relevant questions posed to Plaintiff verbally by Dr. Pribor, written questions submitted to Plaintiff by Dr. Pribor. Either prior to or following the examination, Dr. Prior intends to review medical records relating to Plaintiff's past and present alleged conditions, relevant pleadings and discovery materials in this matter.</p>
MANNER/CONDITIONS OF EXAMINATION:	<p>(1) Pursuant to Dr. Pribor's office policies, only the Plaintiff is to be present in the doctor's office during psychological testing; (2) Plaintiff must be vaccinated against COVID-19 and wear a mask during interactions with Dr. Pribor; if Plaintiff is not vaccinated, please contact Christine Coleman to determine next steps (3) pursuant to standard and accepted format for psychiatric assessment, psychiatric interviews are conducted with the Plaintiff only.</p>

Respectfully submitted,

McMAHON BERGER, P.C.

/s/ Robert D. Younger

Robert D. Younger, #42909MO
Christine S. Coleman #58828MO
2730 North Ballas Road, Suite 200
St. Louis, Missouri 63131
(314) 567-7350
(314) 567-5968 (facsimile)
younger@mcmahonberger.com
coleman@mcmahonberger.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on October 20, 2021 I electronically filed the foregoing with the Clerk of the United States District Court for the Eastern District of Missouri by using the CM/ECF system and that a copy of the foregoing was served via email, upon the following:

Matthew J. Ghio, MO #44799
Ghio Law Firm, LLC
3115 S. Grand Blvd, Suite 100
St. Louis, MO 63118
Tel: (314) 707-5853
Fax: (314) 732-1404
matt@ghioemploymentlaw.com

Attorney for Plaintiff

/s/ Robert D. Younger